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January 30, 2023

**VIA ECF**

Honorable Katharine H. Parker  
United States District Court – Courtroom 17D  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**USDC SDNY**  
**DOCUMENT**  
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**DATE FILED:** 01/30/2023

**Re: Alicia Bonilla, et al. v. Lucero Produce II Corp. and Saul Lucero**  
**Civil No.: 22-cv-00153 (PAE-KHP)**

Dear Judge Parker:

**MEMO ENDORSED**

As permitted by Local Civil Rule 7.1(d) of the United States District Court for the Southern District of New York, and pursuant to Your Honor's Individual Rule 1(c), Defendants, Lucero Produce II Corp. and Saul Lucero, jointly with counsel for Plaintiffs, write to request an adjournment of the February 2, 2023 Case Management Conference pursuant to the Court's September 28, 2022 Order.<sup>1</sup>

The Court has previously granted each of the parties three ("3") previous joint requests for short adjournments in this matter in order to permit the completion of discovery.<sup>2</sup> With respect to the current status of discovery, the depositions of all Plaintiffs have been completed as well as the deposition of Olivia Lucero on behalf of Lucero Produce II Corp. Unfortunately, due to illness as a result of COVID, the scheduled deposition of Defendant, Saul Lucero, previously scheduled to take place on January 31, 2023, will be unable to proceed.

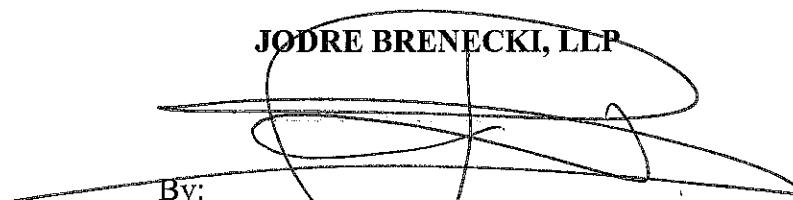
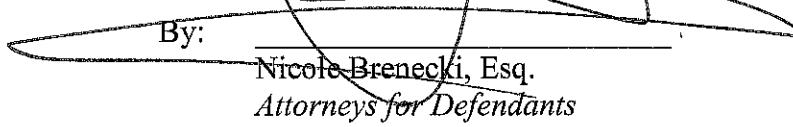
<sup>1</sup> Order, ECF Doc. No. 29, 22-cv-00153 (PAE) (KHP) (E.D.N.Y. September 28, 2022).

<sup>2</sup> Motion for Extension of Time to Complete Discovery, ECF Doc. No. 38, 22-cv-00153 (PAE) (KHP) (E.D.N.Y. December 29, 2022) and Order on Motion for Extension of Time to Complete Discovery, ECF Doc. No. 39, 22-cv-00153 (PAE) (KHP) (E.D.N.Y. January 3, 2023); Letter, ECF Doc. No. 33, 22-cv-00153 (PAE) (KHP) (E.D.N.Y. November 17, 2022) and Memo Endorsement, ECF Doc. No. 34, 22-cv-00153 (PAE) (KHP) (E.D.N.Y. November 17, 2022); Letter, ECF Doc. No. 35, 22-cv-00153 (PAE) (KHP) (E.D.N.Y. November 28, 2022) and Memo Endorsement, ECF Doc. No. 39, 22-cv-00153 (PAE) (KHP) (E.D.N.Y. November 28, 2022).

Resultantly, the parties have already conferred and scheduled Mr. Lucero's deposition for the next mutually available date on February 10, 2023.

Accordingly, it is respectfully requested that the Fact Discovery deadline of February 2, 2023 be extended, and the Case Management Conference, concurrently scheduled for February 2, 2023, be adjourned, in order to permit the completion of this final deposition, as well as to allow responses to any necessary Post-Deposition demands. Thereafter, the parties fully intend to reengage in settlement discussions with the goal of reaching an expeditious resolution.

We thank the Court for its attention to this matter, and we are available at Your Honor's convenience if there are any questions.

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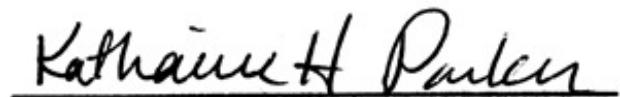
CC: (via Electronic Filing)

**New York Legal Assistance Group**  
*Attorneys for Plaintiffs*

**APPLICATION GRANTED:** The case management conference in this matter scheduled for Thursday, February 2, 2023 at 11:00 a.m. in Courtroom 17-D, United States Courthouse, 500 Pearl Street, New York, New York is hereby rescheduled to Thursday, March 2, 2023 at 10:30 a.m.

The Fact Discovery deadline is hereby extended thirty days to March 6, 2023

**APPLICATION GRANTED**



**Hon. Katharine H. Parker, U.S.M.J.**

**01/30/2023**